# USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Darlington Community School District Agency Code: 33-1295

School(s) Reviewed: Darlington El/Mid

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

Determine whether the SFA meets program regulations,

- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

# **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI <a href="School Nutrition Training">School Nutrition Training</a> webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI <a href="School Nutrition Training">School Nutrition Training</a> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Darlington Community School District for the courtesies extended to reviewers during the on-site and off-site review. Staff were receptive to recommendations and guidance. The lunch program has excellent participation and children have adequate time to enjoy their meals. Keep it up!

#### **REVIEW AREAS**

### 1. MEAL ACCESS AND REIMBURSEMENT

### **Certification and Benefit Issuance**

# Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

159 eligibility determinations were reviewed, 0 errors were identified. The district should be very proud of the results. Great job!

## Free and Reduced Price Meal Applications

### Annual Income

There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

#### Household Size Box

The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

## **Effective Date of Eligibility**

SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

### **Direct Certification**

Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

# **Transferring Students**

Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during

the school year, over the summer, or at the start of the next school year. **Wisconsin DPI requires** source documentation of the student's previous eligibility.

### **Disclosure**

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on
  the application or through direct certification for non-program purposes, such as athletic or testing
  fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year.
  Find the <a href="Sharing Information with Other Programs">Sharing Information with Other Programs</a> template on the Free and Reduced Meal
  Applications and Eligibility webpage (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/doc/sharing-info-other-programs.doc).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template <u>Disclosure of Free and Reduced Price Information</u> form is located on the SNT website (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx).

## Findings and Corrective Action Needed: Certification and Benefit Issuance

	<b>Finding #1:</b> The Sharing Information with Other Programs form developed by the district does not				
	allow parents the ability to consent to the release of their free and reduced status for each local				
	program. The form groups multiple local programs into one wavier.				
Co	Corrective Action Needed: Revise the template to break out local programs. For example:				
	K-12 Book Fees				
	K-12 Athletic Pass				
	9-12 Activity Fee				
(	Co-Curricular Fees				

#### Verification

#### Technical Assistance (TA)/Compliance Reminders

When an application is selected for verification, and prior to hearing back from the household, that household is found on direct certification, the application does not have to be replaced in the verification sample pool (pg. 105 of the <u>Eligibility Manual for School Meals</u>). The application would be marked as a direct certification in the appropriate box in Section 3 of the Verification Collection Report (VCR). LEAs should include these applications in Field 5-5 (Number of applications selected for verification) of the VCR and indicate the number of these applications that are being converted to direct certification in the remarks portion of the VCR.

## **Meal Counting and Claiming**

### <u>Technical Assistance (TA)/Compliance Reminders</u>

When entering the claim it is necessary to use the "edit check" report to calculate your reimbursable meals by site for claim submission.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### **Commendations**

Thank you to the staff at Darlington Elementary/Middle School for the welcome and attentiveness during the on-site review. All staff were pleasant to work with and receptive to feedback. Thank you to the Food Service Director for her time during the on-site review, as well as her positive attitude. Your dedication to the program shows in your high participation rates. All meals on the day of review were observed to be reimbursable. Having monitors near the condiment table to assist younger students and encourage appropriate condiment serving sizes was great to see.

## **Comments/Technical Assistance/Compliance Reminders**

## Meal Pattern Age/Grade Groups

The meal pattern for School Meal Programs was updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 with many of the updates to the National School Lunch (NSLP) and School Breakfast Program (SBP) implemented on July 1, 2012. The updated meal pattern requires specific daily and weekly minimum component offerings for each age/grade group. Many of the recipes submitted included both the K-8 and 9-12 grade groups. While the same foods may be served to each grade group, a single recipe may not accommodate the meal pattern requirements of the two distinct grade groups. The K-8 students may be offered too much food to fit within the dietary specifications; the 9-12 students may not be offered enough food to meet the daily and weekly requirements; and one recipe may not provide the planned number of servings when different serving sizes are needed. Additionally, when using the K-8 meal pattern, all students in grades kindergarten through 8th grade should be offered the same menu.

## Meeting Daily and Weekly Requirements with Multiple Entree Options

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.

#### DPI's Lunch In a "Nutshell"

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf).

Memo <u>SP 10-2012 (v.9)</u> Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"

1. For menu planning purposes, when multiple choice menus are served, how are minimums calculated?

Weekly minimum - example 2: If a grade K-5 school offers a 1 oz. eq. grain item (salad) and a 3 oz. eq. grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz. eq. grain (1 oz. eq. x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz. eq. (pg. 37) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf).

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf).

## **Production Records**

Be specific on production records about the identity, brand, and description of the items served. Reference the specific products being offered with the name of the recipe or by brand name and description. Crediting may differ between brands; including specific information will help to ensure the menu is being served as planned.

### In addition:

- Fruit sizes (e.g. case count) should be recorded
- Condiments should have planned portion sizes
- Actual milk usage by type should be recorded for each meal

A list of production record requirements ("Must Haves and Nice to Haves") and sample production record templates can be found on our <u>Production Records</u> webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the Meal Planning webpage (http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes). We encourage viewing the webcast, What's the Yield with Standardized Recipes?, which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

## Food Quantities on Production Records and Standardized Recipes

The total food quantities need to be enough to cover the total servings planned in at least the minimum planned serving size. Planning too much food increases food cost and food waste. Planning too little food may lead to shortages on the line and shortages in the meal pattern. The USDA Food Fact sheets, the <u>USDA Food Buying Guide</u>, and documentation from product manufacturers can help you determine the appropriate planned quantities needed (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

## Volume versus Weight

Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of

meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

# **Crediting Meat/Meat Alternates**

Some meat/meat alternates do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading). For example, the sliced USDA turkey credits as 1 ounce equivalent (oz. eq.) for every 1.43 ounces by weight. Make sure to use current product information to determine the actual weight needed of each serving in order to meet the daily and weekly ounce equivalent requirements. You may need to obtain a PFS or CN label to show crediting if the exact product cannot be found in the USDA *Food Buying Guide*.

## **Crediting Documentation**

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the Meal Pattern Components webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern).

## <u>Updating Crediting Documentation</u>

Some of the crediting documentation and nutrition facts labels submitted were outdated. This did not change the crediting of any items for the week of review after comparing with documentation that is more recent. Food manufacturers continuously reformulate products used in schools and it is important to stay current with these changes. SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

## Printed Menu

The printed menu should list all components included with a reimbursable meal. Currently, the chef salad is not listed on the menu as an entrée option, but is offered daily.

# Whole Grain-Rich

All grains offered in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component.

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. Alternatively, crediting documentation in the form of a product formulation

statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. Note, a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered whole grain-rich. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products (http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

### <u>Crediting Leafy Green Vegetables</u>

Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example,  $\frac{1}{2}$  cup of fresh, baby spinach credits as  $\frac{1}{4}$  cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served. The leafy green blend currently being used is a 50/50 mix of romaine and iceberg lettuces. The romaine credits toward the dark green vegetable subgroup as half the volume served and the iceberg credits toward the other vegetable subgroup as half the volume served. If you would like to credit the entire creditable amount toward the dark green subgroup, consider using a 100% romaine product.

# <u>Crediting the Scallop Potatoes</u>

The potatoes in the Scallop Potatoes & Ham dish are currently not being credited. The potatoes may be credited toward the starchy vegetable subgroup. If you would like to credit the potatoes in the dish, request a Product Formulation Statement from the manufacturer. Then determine what quantity of scallop potatoes you would need to serve to reach the desired amount of starchy vegetable you wish to credit.

## **Crediting Oranges**

According to the <u>USDA Food Buying Guide</u> for <u>School Meal Programs</u>, one 113-count orange credits as <sup>5</sup>/<sub>8</sub> cup fruit (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs). Therefore, if an orange is cut and served in halves, one half only equals 5/16 cup, which would round down to ½ cup. A full orange needs to be selected in order to obtain a full ½-cup portion.

# Offering Extra Foods

Extra, non-creditable items such as chips are frequently offered on the menu. Not every chip variety offered can be credited toward the meal pattern, but all must still be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable component of a reimbursable meal.

#### **Sodium Targets**

In May 2017, the U.S. Secretary of Agriculture announced schools must continue to meet Sodium Target 1 for school year 2017-2018. USDA recognizes that even though great progress has been made, schools and industry expressed the need for additional time and assistance to effectively achieve changes in the school meal patterns, including those related to sodium. At the same time, the WI DPI encourages schools to "keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible." Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, pickles, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

## Offering Foods after the Meal Line

Offering foods for students to self-serve after trays have been checked for reimbursable meals is strongly discouraged. These foods must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), but they do not contribute toward the meal pattern requirements. Any food you wish to credit toward the meal pattern should not be placed on the condiment table, after trays have been checked for reimbursable meals. If line space is limited, consider keeping all condiments on the condiment table for all grades since staff monitors those tables.

#### Adult Meals

Adults meal portions may include up to the largest portion size planned for students in the 9-12 grade group. Allowing adults to take extra items or larger portions increases food cost, which may not be covered by the price of the adult meal.

### Participation in the School Breakfast Program

The school is currently selling breakfast items to students a la carte. Many of the items offered do not meet Smart Snacks guidelines and the offerings will need to be revised. It may be of benefit to consider participating in the School Breakfast Program (SBP) instead of selling a la carte breakfast items. Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the <a href="School Breakfast">School Breakfast</a> Program webpage (http://dpi.wi.gov/school-nutrition/school-breakfast-program).

## Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ **Finding #1:** The planned menu for the week of review did not meet meal pattern *quantity* requirements. Upon review of the full review period, the same findings were noted in the cycle menu, showing systemic quantity shortages.

## The insufficient quantities include:

• Insufficient daily grain quantity on Tuesday, Wednesday, and Friday of the week of review. Students who selected the Chef Salad entree were offered one serving of croutons daily with the salad. However, the croutons were not recorded on the production record, the weight per serving was not being recorded, and no documentation was provided to show if they were whole grain-rich. The Chef Salad is a daily offering and the croutons should be documented as a creditable grain item or additional grains (beyond the croutons) should be consistently offered to meet the daily 1 ounce equivalent daily requirement.

\*After the on-site review, the Food Service Director determined that 1 ounce of croutons was being offered daily with the salad, providing 1.25 ounce equivalents of grain. Additional technical assistance was given to ensure croutons used are whole grain-rich and should be documented on the production record if they will be credited toward the grain component.

- Insufficient weekly grain quantity offered during the week of review. Students are able to
  choose the PBJ or Chef Salad entrees daily. The PBJ entree meets the 1 ounce equivalent daily
  grain requirement, but when selected daily it is short of the 8 ounce equivalent weekly
  requirement. The Chef Salad entree does not meet the 1 ounce equivalent daily grain
  requirement each day and does not meet the weekly grain requirement.
- Insufficient daily vegetable quantity on Wednesday of the week of review. Students who chose the Spaghetti & Meatballs and Chef Salad entrees had access to at least ¾ cup of vegetables. However, the students who chose the Cold Ham Sandwich and the PBJ entrees only had access

to ½ cup vegetables, which was short of the ¾ cup daily requirement. This was a finding on the previous Administrative Review and is subject to fiscal action.

Fiscal action is required for any repeat violations from the previous Administrative Review. Because insufficient daily vegetable quantity was found during the last AR as well as the current AR, fiscal action will be applied. Per page 83 of the Administrative Review Manual, there will be a re-claim for meals on the day the insufficient quantity was offered during the week of review.

**Corrective Action Needed:** Please submit two weeks of menu planning worksheets with menu changes or products added showing how the above insufficient quantities will be corrected. Please include the week selected as the week of review as one of the two weeks.

☐ Finding #2: No vegetables from the beans/peas/legumes subgroup were offered during the week of review, which is a missing vegetable subgroup. Upon further review of the monthly menu, it was noted that this subgroup appears to be missing on multiple weeks of the cycle menu. This was a repeat finding from the last AR, which will be subject to fiscal action.

Fiscal action is required for any repeat violations from the previous Administrative Review. Because a missing vegetable subgroup was found during the last AR as well as the current AR, fiscal action will be applied. Per page 82 of the Administrative Review Manual, there will be a re-claim for meals for one weekday with the lowest participation at the review site with a missing subgroup.

The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review and addresses both of the above findings subject to fiscal action:

Only  $\frac{3}{4}$  cup total vegetable was offered on  $\frac{2}{4}$ 14. The dark green ( $\frac{1}{4}$  cup offered), red/orange (1 cup offered), and bean/pea (not offered) vegetable subgroups were not met during the week of review. The review was expanded to the month and additional vegetable subgroup and total vegetable shortages were noted weekly. The site uses a 4-week cycle menu, so these concerns are systemic.

\*Note that the 9-12 grade group was reviewed during the previous Administrative Review, so the  $\frac{3}{4}$  cup total vegetable daily offering was short of the 1 cup daily vegetable requirement.

**Corrective Action Needed:** Submit a statement addressing how you plan to incorporate at least ½ cup of beans/peas/legumes into the menu each week.

☐ Finding #3: The sliced bread offered during the week of review and on the day of on-site r	eview was
not whole grain-rich.	

**Corrective Action Needed:** Please procure a whole grain-rich sliced bread to serve instead of the enriched bread currently being offered. Submit the product label with the ingredient list showing a whole grain product as the first grain ingredient.

	☐ Finding #4: T	here was no scale	in the kitchen	available to we	eigh food in ounces.
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**Corrective Action Needed:** Submit a statement that includes your plan to purchase a scale that measures food in ounces and addresses how you will adjust your recipes to use weight for the meat/meat alternate items.

☐ **Finding #5:** Recipes are on-site and in use, but are inaccurate or missing elements of a standardized recipe. Review the <u>Standardized Recipe Checklist</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

**Corrective Action Needed:** Revise the Sub Sandwich standardized recipe by:

making each sandwich variety (turkey, bologna, and tuna) a separate recipe

- including specific and current product information
- revising the actual weights or measure of each ingredient
- ensuring the number of portions, portion sizes, and yields are accurate

Submit a standardized recipe for one of the Sub Sandwich varieties showing the above changes.

### 3. RESOURCE MANAGEMENT

## Nonprofit School Food Service Account

## Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- WUFAR source code 259 should include all catering revenue. The district should only abate revenues against expenditures if there is a return of goods.
- If you plan to purchase equipment that has a useful life of more than one year with funds from the nonprofit food service account and the estimated cost exceeds the School Food Authority's (SFA) capitalization threshold or \$5,000 (whichever is less), you will need to factor another step or two into your procurement process. The first step is to review the <a href="Preapproved Equipment List">Preapproved Equipment List</a>. If the equipment purchase is listed, no further action is needed. If the equipment you wish to purchase is not on the Preapproved Equipment List, submit a PI-6206 form requesting approval from the School Nutrition Team (SNT) before purchase.

## Annual Financial Report (AFR)

A transfer of non-federal funds to cover Nonprogram Foods losses in lieu of raising nonprogram prices must be recorded on the AFR. Nonprogram foods may not be supported by reimbursable meals (program foods) or have a nonprogram foods loss absorbed by the food service account.

## Allowable Costs

Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP23-2017 Unpaid Meal Charges guidance Q & A may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

## **Unpaid Meal Charge Policy**

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the <a href="Unpaid Meal Charges In a "Nutshell" (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf">Unpaid Meal Charges In a "Nutshell"</a> (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf). For a more comprehensive overview, see SP 23-2017: <a href="Unpaid Meal Charges Guidance">Unpaid Meal Charges Guidance</a> https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds
  are left "unclaimed", they cannot be used to offset another student's negative account, unless paid
  households have chosen to donate those funds to the school food service account. All funds left in
  any student meal account which cannot be contacted must be turned over to the Wisconsin
  Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning unclaimed

property that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

## Paid Lunch Equity (PLE)

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

### **Revenue from Nonprogram Foods**

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The <u>DPI Nonprogram Food Revenue Tool/Calculator</u> located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

## **Adult Meals**

- A <u>Wisconsin Adult Meal Pricing Worksheet</u> has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

### **Additional Resources**

- Nonprogram Foods Revenue Rule SP-20-2016 (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf)
- Nonprogram Foods In a "Nutshell" (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

# Findings and Corrective Action Needed: Revenue from Nonprogram Foods

• **Finding**: The Nonprogram Foods Revenue Tool has not been completed for the current school year.

**Corrective Action Needed**: Watch the Nonprogram Foods Revenue Tool webinar and provide a copy of the completed quiz questions and a completed tool for Darlington School District using a 5-day

reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\_html5.html).

## 4. GENERAL PROGRAM COMPLIANCE

## **Civil Rights**

## Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

### Nondiscrimination Statement

When including the <u>non-discrimination statement</u> on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "**This institution is an equal opportunity provider**." Either of these statements must be in the same size font as the other text in the document.

## **Civil Rights Training**

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

### **Special Dietary Needs**

- All food substitutions <u>made outside of the meal pattern requirements</u> must be supported by a signed medical statement from a licensed medical professional. SFAs may use the <u>prototype</u> <u>Medical Statement</u> for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on <u>special dietary needs</u> can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). This <u>flow chart</u> gives guidance on special dietary needs, as well (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf)
- School food service staff may make food substitutions, at their discretion, to accommodate children
  without a signed medical statement from a licensed medical practitioner. It is highly recommended
  that the SFA have a completed medical statement on file from a medical authority (which could be
  the school nurse) to support the request. These accommodations made for students must meet the
  USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended
  that the SFA develop a policy for handling these types of accommodations to ensure that requests
  are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on <u>fluid milk substitutes</u>, please see our Special Dietary Needs webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).

 Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

### **Covering Modified Meal Costs**

Reimbursement for a modified meal is based on a child's eligibility for free, reduced price, or paid
meals, regardless of the extent of the meal modification. SFAs will not receive additional
reimbursement to cover the extra costs sometimes associated with providing a reasonable
modification, and may not charge children with disabilities an extra fee for a modified meal.
Meals must be served for free or at a reduced price to children who qualify, regardless of whether
or not they receive a modified meal or a regular meal. SFAs may not charge children with
disabilities more than they charge other children for Program meals.

### Overt Identification

It was noted that "Current Tx" meal prices for student meals (i.e., \$2.70, \$0.40, and \$0.00) are visible on the computer screen. Cashiers have been through Civil Rights Training and the computers are facing away from students' view. If the district determines that cashiers no longer need this information to do their job, follow-up with your software provider to hide the current transaction meal charge.

# Findings and Corrective Action Needed: Civil Rights

• **Finding #1:** The confirming official did not complete Civil Rights Training. Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

**Corrective Action Required:** View the WI PowerPoint <u>Civil Rights Training</u> and submit an updated copy of the attendance record documenting date of completion.

• **Finding #2:** The lunch calendar menu does not contain the correct shortened non-discrimination statement. The "Reminder to Re-apply" letter sent near the carryover end-date is missing the full non-discrimination statement.

**Corrective Action Required:** Update these documents with the <u>correct statement</u> and submit copies to the consultant via email.

#### **Local Wellness Policy**

# Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The final rule required School Food Authorities (SFAs) to develop a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017. At a minimum, SFAs must permit participation by the general public and the school community. In addition, SFAs must designate one or more school officials to oversee policy compliance.

### Minimum Content of the Wellness Policy

• Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.

- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. SFAs must retain documentation of the results of the triennial assessment and when it took place.
  - To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at <u>School Nutrition Team's Wellness Policy webpage</u> (https://dpi.wi.gov/school-nutrition/wellness-policy).
  - A sample model wellness policy is available at the <u>USDA Wellness Policy webpage</u> (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the <u>Wisconsin Health Atlas webpage</u> (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool (<u>WellSAT</u>) for assistance in assessing the LWP.

#### Resources:

- Please refer to the USDA <u>summary of the requirements</u> for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\_finalrule.pdf).
- USDA Food and Nutrition Service has information on the <u>local school wellness policy</u> process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several <u>wellness policy resources</u> available, including a policy checklist, wellness policy language builder, toolkit, and a wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

## Findings and Corrective Action Needed: Local Wellness Policy

• **Finding #1:** The policy meets some but not all requirements as stipulated above. The agency reviewed the policy on 9/5/17, but did not make necessary updates.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule. The update must include the following items that are currently missing:

- Policy leadership language
- Language permitting the public to participate
- Language specifying how the district will update and inform the public
- Food and beverage marketing language

### **Smart Snacks in Schools**

#### **Comments/Technical Assistance/Compliance Reminders**

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our <a href="Smart Snacks">Smart Snacks</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). Some items sold as part of the alla carte breakfast and in the vending machine are not Smart Snacks compliant. Additionally, second portions of menuitems must meet the Smart Snacks guidelines if they are sold alla carte. We recommend using the Alliance for a Healthier Generation <a href="Smart Snacks Product Calculator">Smart Snacks Product Calculator</a>, found on the Smart Snacks webpage to assess product compliance (https://dpi.wi.gov/school-n0-utrition/national-school-lunch-program/smart-snacks). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

## Findings and Corrective Action Needed: Smart Snacks

☐ Finding: The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, requires that all food and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. Many of the items being sold as part of the a la carte breakfast and in the vending machine do not meet the Smart Snacks standards. Additionally, if second portions of items at lunch will be sold to students a la carte, those items must also meet the Smart Snacks standards.

**Corrective Action Needed:** Please submit a written statement addressing what the SFA will do to ensure all food sold to students during the school day, including items at breakfast and in the vending machine, are Smart Snacks compliant. Include the name(s) of who will be responsible for this as well as a timeline for corrections.

#### **Professional Standards**

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Each SFA must designate at least one staff member as a program "director". A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

#### **Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The
  required annual training hours vary according to the employee's role in the management and
  operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our <a href="Professional Standards">Professional Standards</a> webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

# Annual Training Requirements for All Staff

Directors: 12 hours Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

## Findings and Corrective Action: Professional Standards

☐ **Finding #1:** The food service director title has not been clearly established.

**Corrective Action Needed:** Submit a statement clarifying who the fills the food service director role for Professional Standard purposes. If it is the current food service manager, update the online contract from Head Cook to Food Service Director.

☐ **Finding #2:** Trainings are not tracked.

**Corrective Action Needed:** Include all current training hours for each food service employee onto the central tracking tool and submit as part of corrective action. Include a training plan for staff to meet minimum hours for all positions.

### Food Safety, Storage and Buy American

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

# **Food Safety Inspections**

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

## **Food Safety Plans**

All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the <a href="SNT Food Safety">SNT Food Safety</a> webpage (https://dpi.wi.gov/school-nutrition/food-safety).

# Time as Public Health Control

When using "Time as a Public Health Control:"

- The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
- TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions
  must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot
  TCS food falls to 70°F, or the food is removed from service.

• There can be no leftovers and no reuse of the items covered under this plan. Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

## Findings and Corrective Action: Food Safety

☐ Finding #1: No annual food safety plan review completed.  Corrective Action Needed: Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant via email.
✓ Finding #2: Most recent food safety inspection report is not posted in a publicly visible location. Corrective Action Needed: Post most recent food safety inspection report in location visible to public. Completed on-site. No further action required.
☐ <b>Finding #3</b> : The agency did not have records indicating that two food safety inspections were received from the 2016-17 SY.
<b>Corrective Action Needed</b> : Reach out to the sanitarian that conducted the spring 2017 inspection. Obtain a copy and submit the report to the DPI consultant.
☐ <b>Finding #4</b> : Reach-in milk cooler temperatures are not being recorded. <b>Corrective Action Needed</b> : Begin taking daily milk temperatures and recording them on a log. Submit two weeks of completed milk logs to the DPI consultant via email.

# **Buy American**

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.

- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with
  proof from the manufacturer that poor market conditions exist (weather, and/or supply availability
  of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure the product received and the inventory is compliant with the Buy American procedure. <u>Sample written procurement contract management</u> <u>procedures</u> (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contractmanagement) and <u>Buy American monitoring procedures</u> (https://dpi.wi.gov/schoolnutrition/procurement/buy-american/monitoring) are found on the procurement webpage under Buy American.
- There are limited exceptions to the Buy American provision which allow for the purchase of
  products not meeting the "domestic" standard as described above ("non-domestic") in
  circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for
  more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT <u>Procurement</u> webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

## Findings and Corrective Action Needed: Buy American

- ☐ Finding: The following products were identified in the SFA's storage area as non-domestic and not listed on the SFA's Buy American Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
  - Mandarin Oranges (China)
  - Pineapple (Indonesia)

**Corrective Action Needed:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A <u>template form</u> is located on the procurement webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

### **Reporting and Recordkeeping**

Program records must be kept for a period of three years plus the current year. If there are open audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit.

#### Findings and Corrective Action: Reporting and Recordkeeping

Finding: Wisconsin School Day Milk Program (WSDMP) source documents (point of sale checklists)
are not kept for the minimum timeframe. Darlington 4K and Holy Rosary 4K submit source
document numbers each month to create a summary count sheet similar to an edit check, but then
source documents are discarded. The summary sheets were used to consolidate the 1617 SY and
were kept.

**Corrective Action Required:** Provide a Statement explaining how records will be maintained as required.

# Summer Food Service Program (SFSP) Outreach

# Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Darlington School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the <u>summer meals locator</u> on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA <u>Summer Food</u> website (http://www.fns.usda.gov/summerfoodrocks)

#### Resources:

- To access an inclusive map of all potential participating sites in your area, see the <u>interactive</u> map on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
   Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

# Findings and Corrective Action: SBP and SFSP Outreach

• **Finding #1**: The SFA did not conduct SFSP outreach before the end of the school year to ensure that eligible families are informed of the availability and location.

**Corrective Action Needed**: Submit a plan as to how the district will notify families of summer feeding options near the end of the 2017-18 SY.

#### 5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

## Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The solicitation document for milk bids has old language that should be updated to reflect actual milk types used and include language referring to the Wisconsin School Day Milk Program (WSDMP). See examples of Milk bid templates on our website.

# Findings and Corrective Action: Wisconsin School Day Milk Program

☐ Finding: Darlington SD is claiming for the milks at Holy Rosary 4K (in addition to Darlington 4K) because the community 4K program is operated by the public school district. Student revenues for *paid* WSDMP milk sales from Holy Rosary 4K are not making it back to Darlington SD. Furthermore, the milk cost is being paid for by Holy Rosary School.

**Corrective Action Required:** Revenues received for the sale of *paid* milks should be receipted to Darlington Public- as the public school district is operating and claiming for this program. In return, if

Holy Rosary is going to provide the milk, the cost of the milks served for the 4K WSDMP should be paid for by the public school district. Submit a statement explaining when and how the process will change for the rest of the 1718 SY and moving forward.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



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